

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<hr/>	:	CHAPTER 13
	:	
PATRICK J. LYONS	:	BANKRUPTCY NO. 17-12550
	:	
Debtor	:	
<hr/>	:	

MOTION OF M & T FOR RELIEF FROM STAY

Patrick J. Lyons (the “Debtor”), by and through his counsel, Alaine V. Grbach, Esquire, respectfully represents as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. No foreclosure has been instituted.
6. Admitted in part, denied in part. At no time relevant hereto did Moveant invoice Debtor for the second mortgage payment. It was only after the instant Motion was filed that at invoice/statement was sent to counsel to Debtor.
7. BLANK
8. Denied as a conclusion of law to which no response is require. Debtor, in his Chapter 13, desires to avoid Moveant’s mortgage.
9. Denied.
10. Denied as a conclusion of law to which no response is required.
11. Denied as a conclusion of law to which no response is required.

WHEREFORE, the Debtor respectfully requests this Honorable Court enter an Order (i) denying the relief requested and (ii) granting such other and further relief as this Honorable Court deems just and proper.

Respectfully submitted,

ALAINE V. GRBACH, ESQ.

By: /s/ Alaine V. Grbach
ALAINE V. GRBACH, ESQ.
675 Estelle Drive
Lancaster, PA 17601
Counsel to the Debtor

Dated: February 5, 2018

